

# KAPLAN HECKER & FINK LLP

350 FIFTH AVENUE | SUITE 7110  
NEW YORK, NEW YORK 10118  
TEL (212) 763-0883 | FAX (212) 564-0883  
WWW.KAPLANHECKER.COM

DIRECT DIAL 212.763.0889  
DIRECT EMAIL [shecker@kaplanhecker.com](mailto:shecker@kaplanhecker.com)

June 18, 2021

**BY ECF**

Honorable Richard J. Sullivan  
United States Circuit Judge  
Southern District of New York  
40 Foley Square  
New York, NY 10007

**RE: United States v. Burgess, et al., 18 Cr. 373 (RJS)**

Dear Judge Sullivan:

Pursuant to this Court's June 4, 2021 Order (Dkt. 821), I write to confirm that I met with Ramal Curtis via videoconference on June 11, 2021 and to propose a schedule for sentencing.

Based on my conversation with Mr. Curtis and my initial review of the materials that I have received, I request this Court's permission to file a supplemental sentencing memorandum on Mr. Curtis's behalf. I request that the supplemental sentencing memorandum be due on August 16, 2021, the government's response be due on August 23, 2021, and sentencing be scheduled for some date shortly thereafter. The government has consented to this proposed schedule.

Thank you for your consideration.

Defendant's motion is granted. IT IS HEREBY ORDERED THAT Defendant's sentencing will take place on Friday, August 27, 2021 at 10:00 a.m. at the Daniel Patrick Moynihan Courthouse, 500 Pearl Street, New York, New York 10007. Defendant shall file his supplemental sentencing submission by August 16, 2021. The government may file a response to Defendant's submission by August 23, 2021.

SO ORDERED:  
Dated: 6/18/2021

  
RICHARD J. SULLIVAN  
U.S.C.J., Sitting by Designation

Respectfully submitted,

/s/ Sean Hecker  
Sean Hecker  
KAPLAN HECKER & FINK LLP  
350 Fifth Avenue, Suite 7110  
New York, New York 10118  
Telephone: (212) 763-0889  
Facsimile: (212) 564-0883  
[shecker@kaplanhecker.com](mailto:shecker@kaplanhecker.com)

*Counsel for Defendant Ramal Curtis*